Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of	)
	)
Amendment of Part 15 regarding new requirements	)
and measurement guidelines for Access Broadband	) ET Docket No. 03-104
over Power Line Systems	)
	)
Carrier Current Systems, including Broadband over	) ET Docket No. 04-37
Power Line Systems	

To: The Commission:

Ofcom, the UK's telecommunications regulatory agency, published their well-supported, detailed and comprehensive BPL interference findings on May 11, 2005. They conclude:

Electricity supply cables are not designed, screened or balanced for high frequency use and even when buried below ground they can radiate significant leakage emissions. PLT leakage emissions occupy parts of the high frequency radio spectrum above 2 MHz and have the potential to interfere with the reception of radio communication services including short wave broadcasts.

The PLT interference issue has proved to be contentious and remains under discussion both within Europe and elsewhere. Various radiated emission limits have been proposed, either for establishing network compliance or less rigidly, for the purposes of adjudication in cases of reported interference. ***It appears, however, that none of the proposed emission limits can currently satisfy the dual objective of protecting radio reception whilst, at the same time, allowing PLT to operate in a commercially viable manner****.* [Emphasis added]

Source:

http://www.ofcom.org.uk/research/technology/cet/powerline/

Links to detailed equipment analysis:

http://www.ofcom.org.uk/research/technology/cet/powerline/amperion.pdf

http://www.ofcom.org.uk/research/technology/cet/powerline/ascom.pdf

http://www.ofcom.org.uk/research/technology/cet/powerline/ds2.pdf

The growing body of evidence of failed BPL trials, well documented field observation of harmful interference and detailed regulatory analysis all strongly support the position that BPL can not be deployed commercially while protecting radio reception.

Thank you for your consideration in this matter.

Sincerely,

G. Scott Davis
Extra Class Amateur Radio Operator – N3FJP